

UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	CASE NO. 12-25318-JAD
	)	
JOSEPH F. FIGUEIREDO, JR.	)	
	)	CHAPTER 13
	)	
DEBTOR	)	RELATED DOCUMENT NO.
	)	
	)	RELATED TO CLAIM NO. 2
OCWEN LOAN SERVICING, LLC	)	
MOVANT	)	
	)	
VS.	)	
	)	
JOSEPH F. FIGUEIREDO, JR.	)	
RESPONDENT	)	

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE AND  
CHAPTER 13 PLAN FEASIBILITY**

The undersigned hereby declares that the Debtor was instructed to take over direct mortgage payments beginning in December 2017.

Therefore, no amended Plan is necessary and/or objection to the notice is required.

December 4, 2017

/s/ Edgardo D. Santillan  
Edgardo D. Santillan, Esquire  
PA ID No. 60030  
SANTILLAN LAW FIRM, P.C.  
775 Fourth St.  
Beaver, PA 15009  
724-770-1040  
[ed@santillanlaw.com](mailto:ed@santillanlaw.com)

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JOSEPH F. FIGUEIREDO, JR.	)	
RESPONDENT	)	

**CERTIFICATION OF SERVICE**

I, Edgardo Santillan, Esquire of SANTILLAN LAW FIRM P.C., 775 Fourth St. Beaver, PA 15009 certify:  
That I am, and at all times hereinafter mentioned was, more than 18 years of age;

That on the 4th day of December 2017, **I SERVED A COPY OF THE WITHIN DECLARATION  
REGARDING MORTGAGE PAYMENT CHANGE AND CHAPTER 13 PLAN FEASIBILITY UPON THE  
FOLLOWING:**

Ronda J. Winnecour  
Chapter 13 Trustee  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
**Via ECF Noticing**

U.S. Trustee  
1001 Liberty Avenue  
Liberty Center Suite 970  
Pittsburgh, PA 15222  
**Via ECF Noticing**

**Phelan Hallinan Diamond & Jones, LLP**  
1617 JFK Boulevard Suite 1400  
Philadelphia, PA 19103  
Attn: Thomas Song, Esq.  
**VIA First Class Mail**

I certify under penalty of perjury that the foregoing is true and correct.

EXECUTED ON DECEMBER 4, 2017

s/ Edgardo D. Santillan  
Edgardo D. Santillan Esquire  
PA ID No. 60030  
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Beaver, PA 15009  
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